

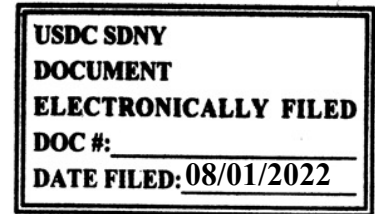
**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

60 East 42<sup>nd</sup> Street • Suite 4700 • New York, New York 10165  
T: 212.792-0048 • E: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)

December 10, 2020

**Via Electronic Filing**

The Honorable Katherine H. Parker, U.S.M.J.  
U.S. District Court, Southern District of New York  
500 Pearl Street  
New York, New York 10007



*Re: Rene v. 31 East 21 Express Inc.*  
**Case No.: 1:21-cv-07435-JGK**

**MEMO ENDORSED**

Dear Honorable Magistrate Judge Parker:

This law firm represents Defendant Pun San Laan Inc. (the “Defendant”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practices Rules I(b) and (I)(c), this letter respectfully serves as a request to adjourn the in-person settlement conference currently scheduled for August 9, 2022 to one of the following proposed dates and times:

1. August 18, 2022 at 10:00 a.m.
2. August 19, 2022 at 10:00 a.m.
3. September 5, 2022 at 10:00 a.m.
4. September 6, 2022 at 10:00 a.m.
5. September 7, 2022 at 10:00 a.m.

The basis of this request is that the undersigned counsel will be traveling overseas beginning July 29, 2022.

If granted, this request would not affect any other previously scheduled deadlines. The undersigned contacted Plaintiff’s counsel on July 27, 2022 regarding the instant request. As of the date of this filing, Plaintiff’s counsel has not responded to the undersigned’s meet-and-confer attempt. Thus, this application is not made on consent of Plaintiff’s counsel.

We thank the Court for its attention to this matter, and are available at the Court’s convenience to answer any questions related to the foregoing.

Respectfully submitted,

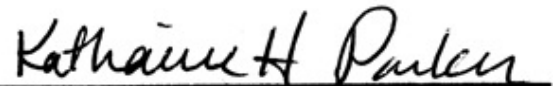
LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi  
Jason Mizrahi  
60 East 42<sup>nd</sup> Street, Suite 4700  
New York, NY 10165  
Tel. No.: (212) 792-0048  
Email: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)  
*Attorneys for Defendants*

VIA ECF: All Counsel

**APPLICATION GRANTED:** The settlement conference in this matter scheduled for Tuesday, August 9, 2022 at 10:00 a.m. in Courtroom 17-D, United States Courthouse, 500 Pearl Street, New York, New York is hereby rescheduled to Wednesday, September 21, 2022 at 10:00 a.m. Parties must attend in-person with their counsel. Corporate parties must send the person with decision making authority to settle the matter to the conference. The parties are instructed to complete the Settlement Conference Summary Report and prepare pre-conference submissions in accordance with the Judge Parker's Individual Rules of Practice. Pre-conference submissions must be received by the Court no later than September 14, 2022 by 5:00 p.m.

**APPLICATION GRANTED**



**Hon. Katharine H. Parker, U.S.M.J.**

08/01/2022